

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

THE NOCO COMPANY, INC.,

Plaintiff,

v.

AUKEY TECHNOLOGY CO., LTD., et al.,

Defendants.

Case No. 1:20-cv-02322- DAR

Judge: Hon. David A. Ruiz

Magistrate Judge: Reuben J. Sheperd

**DEFENDANT AUKEY TECHNOLOGY CO., LTD.’S
MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**

Defendant Aukey Technology Co., Ltd (“Aukey”) respectfully requests, pursuant to Local Rule 5.2, the Stipulated Protective Order (ECF 41) and Plaintiff The Noco Company’s (“NOCO”) confidential document designations that the Court grant Aukey leave to file: (i) excerpts of the transcripts from the depositions of Jonathan Nook and Jeffrey Weiner (Exhibits E and F of the Declaration of Heath Hyatt); and (ii) redacted and un-redacted versions of its memorandum in support of Aukey’s renewed motion to compel (the “Brief”).

Aukey seeks leave to file under seal excerpts of the transcripts from the depositions of Jeffrey Weiner and Jonathan Nook, both in their personal capacities and as Rule 30(b)(6) representatives of NOCO. NOCO has designated the transcripts as “ATTORNEYS’ EYES ONLY,” so Aukey is restricted from filing the transcripts in the public record. *See* ECF No. 41. Aukey is also restricted from filing documents under seal without the Court’s permission. *See* Local Rule 5.2. Therefore, Aukey requests the Court grant Aukey leave to file the transcripts under seal.

Additionally, it is necessary for Aukey to intertwine the confidential information in the transcripts with the text of its Brief. Therefore, Aukey also requests that the Court grant it leave, pursuant to the Stipulated Protective Order, to file a redacted version of its Brief for the public docket as well as an unredacted version for sealing. *See* ECF No. 41

Dated: July 1, 2024

Respectfully submitted,

/s/ Heath L. Hyatt

Heath L. Hyatt (admitted *pro hac vice*)

HHyatt@perkinscoie.com

PERKINS COIE LLP

1201 Third Avenue, Suite 4900

Seattle, WA 98101

Telephone: (206) 359-8000

Facsimile: (206) 359-9000

John D. Esterhay (admitted *pro hac vice*)

JEsterhay@perkinscoie.com

PERKINS COIE LLP

11452 El Camino Real, Suite 300

San Diego, CA 92130-2080

Telephone: (858) 720-5700

Facsimile: (858) 720-5799

Brandon M. White (#0075430)

BMWhite@perkinscoie.com

PERKINS COIE LLP

700 13th Street NW

Suite 800

Washington, DC 20005

Telephone: (202) 654-6200

Facsimile: (202) 654-6211

**ATTORNEYS FOR DEFENDANT
AUKEY TECHNOLOGY CO., LTD.**

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was filed electronically via the Court's electronic docketing system on July 1, 2024. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Heath L. Hyatt
Heath L. Hyatt

Counsel for Defendant
AUKEY TECHNOLOGY CO., LTD.